

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

CHEVRON U.S.A. INC., *et al.*,

Plaintiffs,

V.

THE UNITED STATES,

Defendant.

No. 20-1784
(Senior Judge Lettow)

JOINT MOTION TO AMEND DISCOVERY SCHEDULE

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, Plaintiffs Chevron U.S.A. Inc., Texaco Downstream Properties Inc., and Union Oil Company of California, and Defendant, the United States, respectfully submit this joint motion to amend the scheduling order. The parties respectfully request a modified scheduling order to extend the deadlines in the case schedule by six months.

The parties have worked diligently on discovery, producing documents and serving and responding to written discovery requests. The parties agree that additional time is needed for fact discovery to ensure that the parties have adequate opportunity to review their respective document productions and, if necessary, produce additional documents and conduct additional fact discovery. Towards this end, the parties propose to extend the deadlines in the current schedule by six months.

For the reasons stated above, the parties respectfully submit the following proposed amended discovery schedule:

August 1, 2024	Close of fact discovery;
February 1, 2025	Deadline for Plaintiffs to designate affirmative expert witnesses and provide report(s) required by RCFC 26(a)(2);
April 1, 2025	Deadline for Defendant to designate expert witnesses and provide report(s) required by RCFC 26(a)(2);
May 15, 2025	Deadline for Plaintiffs to designate rebuttal expert witnesses and provide rebuttal expert report(s); and
July 15, 2025	Close of expert discovery and completion of expert witness depositions.

Respectfully submitted,

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